IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

BRANDON M. WILBORN

Plaintiff

:

v. : Civil Action No. 18-3597

:

WILLIAM BARR, et al.

Defendants

MOTION FOR DECLARATORY AND INJUNCTIVE RELIEF

Pursuant to F.R.C.P. 7, 57, and 65, Plaintiff Brandon Wilborn hereby respectfully moves this Court for declaratory and injunctive relief, consistent with the relief requested in the Complaint or, in the alternative, pursuant to F.R.C.P. 20 or 15, that the Court grant leave either for the joinder of all similarly situated individuals or for an amended complaint to be filed with class action averments. The accompanying memorandum of law is submitted in support of this motion.

Dated: November 15, 2019

Respectfully Submitted,

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing and memorandum of law in support was filed electronically through the Eastern District of Pennsylvania Electronic Filing System. Notice of this filing will be sent by operation of the Court's Electronic Filing System to all registered users in this case.

Civil Rights Defense Firm, P.C.

Date: November 15, 2019

By:

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